

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Indict No. 14 Cr 034 (RMB)

UNITED STATES OF AMERICA

- against -

DINESH D'SOUZA,

Defendant.

**DEFENDANT'S CHANGES AND/OR ADDITIONS TO THE GOVERNMENT'S
PROPOSED EXAMINATION OF PROSPECTIVE JURORS**

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We respectfully request the following additions to the Government's Proposed Examination of Prospective Jurors.

DEFENDANT'S STATEMENT OF CASE

The Defense's statement of the case is as follows: The defendant maintains that he is innocent of the charges. The defendant remains adamant that he neither knowingly nor willfully violated the criminal law.

DEFENDANT'S PUBLICATIONS

We respectfully request that the Court question the prospective jurors on the Defendant's various publications and films. The Defense requests that the court inquire as to whether any of the prospective jurors: Have heard of Dinesh D'Souza; have read or viewed any of his writing or films, including but not limited to, "The Roots of Obama's Rage," "Obama's America," and "2016". In addition, the Defense requests that the Court inquire as to whether any of the prospective jurors have followed the case in the media. Finally, the Defense respectfully requests that the Court inquire as to whether any of the defendant's views would cause the juror to have any difficulty being fair and impartial.

POLITICAL ACTIVITIES

We respectfully request that the Court inquire into whether any of the prospective jurors have actively participated in a political campaign, or contributed to a political candidate, and the nature of participation and or contribution. Furthermore, the Defense requests that the Court inquire as to whether any of the prospective jurors have any views regarding, or participated in the candidacy of Wendy Long or Kirsten Gillibrand for Senate, or President Barack Obama.

Dated: New York, New York
April 23, 2014

Respectfully Submitted,

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